

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE: _____)
)
RAYMOND WAYNE LINK JR.) Case No. 21-32046-KLP
)
) Chapter 7
Debtor)_____

MOTION FOR EXTENSION OF TIME FOR FILING REAFFIRMATION AGREEMENT

COMES NOW the Debtor, by counsel, and files this Motion to extend the time for the filing of a Reaffirmation Agreement, and in support hereof state unto the Court as follows:

1. The Debtors filed the Chapter 7 petition herein on June 29, 2021.
2. The Debtor's Statement of Intention indicates a desire to reaffirm a car loan with Virginia Credit Union.
3. Virginia Credit Union has not yet provided Debtor's counsel with a Reaffirmation Agreement for the Debtor to execute and the Debtor needs additional time to do so.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order to extending the time for the filing of a Reaffirmation Agreement, and for such other relief as the Court may deem appropriate.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
P.O. Box 508
Richmond, VA 23218
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jkane@kaneandpapa.com
Counsel for Debtor

Respectfully submitted,

RAYMOND WAYNE LINK JR.

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
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jkane@kaneandpapa.com
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane
James E. Kane

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NOTICE OF MOTION

The above Debtor has filed a Motion to extend the time for the filing of a Reaffirmation Agreement.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then within seven (7) days from the date of this Notice, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
P.O. Box 508
Richmond, Virginia 23218

- Attend a hearing to be scheduled by the Court. You will receive a separate notice of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

RAYMOND WAYNE LINK JR.

By: /s/ James E. Kane
Counsel

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/s/ James E. Kane
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